

ENVIRONMENTAL MANAGEMENT APPRAISAL

GOODYEAR ATOMIC CORPORATION

June 22-25, 1982

Portsmouth Gaseous Diffusion Plant

APPROVED FOR RELEASE BY:  
N.F. CHRISTOPHER

*NFC* DOE 3-22-00

APPROVED FOR RELEASE BY:

*[Signature]*

ENVIRONMENTAL MANAGEMENT APPRAISAL

GOODYEAR ATOMIC CORPORATION

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PORTSMOUTH GASEOUS DIFFUSION PLANT

I. Introduction

This report summarizes the ORO Environmental Protection Branch findings concerning Goodyear Atomic Corporation environmental management activities at the DOE Portsmouth Gaseous Diffusion Plant. The appraisal covers the time period since the previous appraisal (September 22, 1981) and was conducted per DOE Order 5482.1A requirements. Applicable executive orders, environmental laws, implementing regulations, DOE Orders, and ORO supplements were used to evaluate the above contractor.

II. Summary and Conclusions

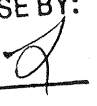
The contractor's environmental management performance for the appraisal period is considered "excellent." Substantial improvements have been accomplished in regards to steam plant opacity monitoring, implementation of RCRA hazardous waste management program, communications, and the timely submittal of required reports. Other environmental protection areas have continued to be carried out effectively.

III. Recommendations

A. 1982 Appraisal Recommendation

It is recommended that a permanent dike be installed around the X-752 hazardous waste storage facility by the end of the fiscal year.

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Installation of the dike should have priority over the other items listed in the proposed improvement project for the facility.

B. 1981 Appraisal Recommendation

The recommendation to fill the vacancies in the Environmental Management Program has been accomplished. Two technical staff members and one clerical worker have been added to the Environmental Control Department.

IV. Performance Criteria

A. Mission


1. Assure environmental radiation exposures are maintained as low as reasonably achievable and within the prescribed standards, control of sources of environmental pollution, and compliance with Federal environmental protection laws and with Executive Order 12088.

Status: The GAT Environmental Management Program continues to do a creditable job in this area.

B. Management

1. Environmental protection program implemented throughout the organization with clear assignment of responsibilities and authorities.

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Status: GAT's performance in this area has improved substantially during the appraisal period and is considered to be excellent.

2. Complete documentation of environmental protection program which provides auditability necessary to allow independent review.  
See DOE 5482.1A, Section 10, a.-c., e.-i., and k.

Status: GAT is doing an adequate job in this area.

C. Resources

1. Sufficient qualified staff resources allocated to fully implement environmental protection responsibilities.

Status: GAT's Environmental Control Department is well staffed.

2. Sufficient equipment and facilities to support environmental protection activities.

See DOE 5482.1, Section 10, d., e., and i.

Status: GAT is considered to be excellent in this area.


D. Compliance

1. Compliance with requirements of DOE 5480.1A, Chapter I, 5.a., Prescribed Standards.

Status: Performance this past year has been adequate.

2. Compliance with internal audit requirements of DOE Order 5482.1A, 8.c.(4), and 9.c. (except RMI).

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Status: GAT's Internal Audit Program meets the requirements of  
DOE 5482.1A.

3. Compliance with DOEM and OR Supplements.

Status: Compliance this past year has been adequate.

4. Adequate response to appraisal recommendations and/or special requests.

Status: GAT's performance in this area has improved and is now considered excellent.

V. General


A. Review of 1981 Appraisal

The problem of late reports, which was noted in the 1981 appraisal, has been corrected. The majority of reports have been received by ORO on or before the due date.

The report on corrosion in the steam plant which was requested has been prepared and submitted to ORO. The SO<sub>2</sub> dispersion modeling report, which also was requested, has been discontinued. Further review of the EPA modeling data and discussions with the ORO staff has indicated that the report is not needed.

The temporary dike for the X-752 Hazardous Waste Storage Facility has not been replaced as suggested but plans for a permanent dike have been formulated; see 1982 Recommendation.

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B. Staffing

ORO was pleased to see that the vacancies in the Environmental Control Department have been filled. The addition of two staff members should assure that the improvements seen in the past year will continue throughout the coming year. The Environmental Control Department's staff is well qualified, both from a general technical background and in their specific area. The addition of a new clerk to the staff should assure that the increased work from the additional staff will not again cause reports to be chronically late.

C. PCBs

The handling of PCB materials and wastes continues to be done in an acceptable manner. The interim measures program has been in effect for one year and GAT's compliance with it has been excellent. The lube oil systems continue to be a headache, but the handling of leaks and cleanup materials is satisfactory. The wastes from these systems are presently stored in a temporary dike, and ORO would like to see a permanent one, as recommended by the Environmental Control Department, installed as soon as possible. Work on disposal or cleanup of the contaminated lube oil is continuing; ORO encourages this work.

D. Waste Oil

The handling of waste oils at the present time appears to be adequate. The completion of the X-740 storage building and the X-109 recycle building should assure proper handling of waste oils.

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The potential for contaminating oils with RCRA regulated solvents is a problem that concerns ORO. We request GAT to provide the necessary documentation to assure us that the waste oils at GAT, most notably those used for dust control, will not be contaminated with such solvents. This can be such things as RCRA administrative procedures that prevent solvents from being placed in oil, documentation that such cross contamination cannot occur because the two are not used in the same area, etc.


The continuing investigation into alternate treatment, recycle, and disposal for uranium contaminated as well as noncontaminated oils is encouraged by ORO.

E. NPDES and SPCC

NPDES compliance continues to be adequate. Planning for compliance with upcoming requirements of the NPDES permit has been excellent. Despite funding problems, several projects such as coal pile runoff treatment, will be installed by the NPDES compliance schedule date. Other projects such as biodegradation have been delayed due to budget and contracting regulatory requirements, but GAT has found the most expeditious method for completing them.

The audit of containment dikes has shown all valves to be closed except when water is being drained. Dikes are being drained of water regularly to assure that in the event of a leak the total volume of the dike will be available for containment. The testing

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of dikes scheduled for later this year should assure that they are capable of performing this function. ORO would like to see the results of this study when they become available.

F. Hazardous Waste Management

Substantial progress has been made in implementing a hazardous waste management program in compliance with Ohio and U.S. EPA RCRA regulations. A formalized training program for GAT personnel involved in hazardous waste activities has finally been developed that should fulfill the RCRA training requirements. Characterization of waste streams according to RCRA testing procedures appears adequate with the possible exception of waste oils. An improvement project to upgrade the X-752 hazardous waste storage area should easily meet the RCRA storage requirements. However, the estimated schedule for completion of this project is of some concern. It is recommended that the permanent dike portion of this improvement project be given priority over the rest of the project in terms of order of installation and that efforts be made to arrange for completion of the dike by the end of the fiscal year.

G. Opacity Monitoring

Noteworthy improvements in the preparation of monitoring reports and maintenance of the monitors have been accomplished. Environmental Control has committed considerable efforts in identifying problem areas, coordinating maintenance and operational corrective actions,

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A marked improvement in communications has been demonstrated by Environmental Control, particularly between staff members and DOE. Efforts to improve communications with other GAT groups are evident with coordination involving the steam plant monitoring problems. Requirements for GAT compliance with RCRA appear to be clearly presented to appropriate personnel. The staff has lent their expertise to GCEP requests involving air permit applications and waste disposal considerations.

J. C. Bird 7/13/82  
(Date)

M. A. Travaglini 7/13/82  
M. A. Travaglini (Date)

APPROVED FOR RELEASE BY:

P. O. BOX 273  
OXFORD, OHIO 45051

DATE: 06-24-1982

June 24, 1982

*But send 9/82*

Department of Energy  
Oak Ridge Operations  
Enriching Operations Division  
P. O. Box E  
Oak Ridge, TN 37830

*cy: EDP  
6/24/82*

Attention Mr. H. D. Fletcher, Director

Gentlemen:

FOLLOW-UP TO DOE OCCUPATIONAL SAFETY AND HEALTH PROGRAM INSPECTION  
(Your June 4, 1982 letter, SE-333:EAM)

We were pleased to hear that all violations found during the March 18-24, 1982 inspection have been abated.

With regard to housekeeping, the areas of concern were those where the CIP/CUP program is in progress. It is extremely difficult to keep these areas in what we consider a tidy condition.

Each building does have a "Joint Housekeeping Committee" to address these concerns.

I can assure you that housekeeping has been and will continue to be a high priority item at GAT.

Very truly yours,

Original Signed by,  
N. H. Hurt

N. H. Hurt  
General Manager

RLS:jd

bcy: ~~R. A. Collins~~  
C. M. Hutchings  
R. L. Shepler

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*[Signature]*



Department of Energy  
Oak Ridge Operations  
P.O. Box E  
Oak Ridge, Tennessee 37830

Orig: Hutchings

Copy: ~~Collins~~

Shepler--to prepare a response  
on housekeeping item delineating corrective  
action.

NRH 6/9/82

*Shepler*  
*DP*

June 4, 1982

*Cy: EDP*  
*6/9/82*

Goodyear Atomic Corporation  
ATTN: Mr. N. H. Hurt  
General Manager  
Post Office Box 628  
Piketon, Ohio 45661

Dear Mr. Hurt:

*EE 2c*  
*4/20/82*  
*W*  
FOLLOW-UP TO DOE OCCUPATIONAL SAFETY AND HEALTH PROGRAM INSPECTION

A follow-up of the March 18-24, 1982, Occupational Safety and Health Program inspection of the Portsmouth GDP was conducted May 26, 1982, by a member of the ORO Safety and Environmental Control Division. The purpose of the follow-up visit was to verify that all the violations found during the original inspection had been abated.

The inspection disclosed that all violations found during the March 18-24, 1982, inspection have been abated; however, it was found that more attention is needed to maintain housekeeping in the change-out area (Violation No. 1) at a more acceptable level.

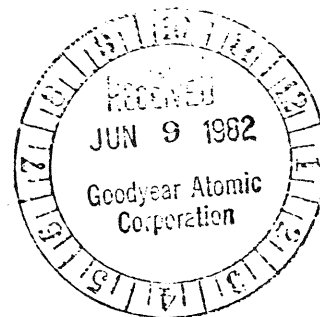
The cooperation extended by members of your staff during the follow-up inspection is greatly appreciated.

Sincerely,

*H. Doran Fletcher*  
H. Doran Fletcher, Director  
Enriching Operations Division

SE-333:EAM

cc: V. J. D'Amico, SE-30  
J. W. Swafford, PE-10  
W. H. Travis, SE-33



ORIGINAL

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*[Signature]*

*Released with  
Com munciations -  
Commendable!*

1981 Environmental Management Appraisal  
Portsmouth Gaseous Diffusion Plant  
June 22-25, 1982

8/25/82

Critique Handout

Summary

We are generally pleased with the performance of the Portsmouth GDP Environmental Management program during the appraisal period. Substantial improvements have been accomplished in regards to Steam Plant opacity monitoring, implementation of an RCRA hazardous waste management program, and communications. Other environmental protection areas have continued to be carried out effectively.

1982 Appraisal Recommendation

*Ohio EPA  
would also  
find this*

*1983 CRR 400' X 752' 20' X 50' X 1000'*  
It is recommended that as soon as possible a permanent dike be installed around the X-752 Hazardous Waste Storage Facility. Installation of the dike should have priority over the other items listed in the proposed improvement project for this facility.

1981 Appraisal Recommendation

The recommendation to fill the vacancies in the Environmental Management Program has been accomplished. Two technical staff members and one clerical worker have been added to the Environmental Management Program.

*Will need to GC EP. shown.*

Findings

Review of 1981 Appraisal

The problem of late reports, which was noted in the 1981 appraisal, has been corrected. The majority of reports have been received by ORO on or before the due date.

The report on corrosion in the steam plant which was requested has been prepared and submitted to ORO. The SO<sub>2</sub> dispersion modeling report, which also was requested, has been discontinued. Further review of the EPA modeling data and discussions with the ORO staff has indicated that the report is not needed.

The temporary dike for the X-752 Hazardous Waste Storage Facility has not been replaced as suggested but plans for a permanent dike have been formulated, see 1982 Recommendation.

Staffing

ORO was pleased to see that the vacancies in the Environmental Control Department have been filled. The addition of two staff members should assure that the improvements seen in the past year will continue throughout the coming year. The Environmental Control Department's staff is well qualified, both from a general technical background and in their specific area.

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*Q.*

The addition of a new clerk to the staff should assure that the increased work from the additional staff will not again cause reports to be chronically late.

PCB's *Well satisfied -*

The handling of PCB materials and wastes continues to be done in an acceptable manner. The interim measures program has been in effect for one year and GAT's compliance with it has been excellent. The lube oil systems continue to be a headache, but the handling of leaks and clean-up materials is satisfactory. The wastes from these systems is presently stored in a temporary dike and ORO would like to see a permanent one, as recommended by the Environmental Control Department, installed as soon as possible. Work on disposal or clean up of the contaminated lube oil is continuing, ORO encourages this work.

*Eng looking at cost  
Technical working on several*

*ORO + GATR discussing  
5 gal to Akron -*

*Seen working on  
transformer oil  
only -*

#### Waste Oil

The handling of waste oils at the present time appears to be adequate. The completion of the X-740 storage building and the X-109 recycle building should assure proper handling of waste oils.

The potential for contaminating oils with RCRA regulated solvents is a problem that concerns ORO. We request GAT to provide the necessary documentation to assure us that the waste oils at GAT, most notably those used for dust control, will not be contaminated with such solvents. This can be such things as RCRA administrative procedures that prevent solvents from being placed in oil, documentation that such cross contamination cannot occur because the two are not used in the same area, etc.

The continuing investigation into alternate treatment, recycle, and disposal for uranium contaminated as well as non-contaminated oils is encouraged by ORO.

Communications *Steam Plant - GCEP - ORO*

Commendable improvements have been made in the area of communications, particularly between the Environmental Control Department and the ORO Environmental Protection Branch, and specifically with Steam Plant personnel. The staff has provided expertise to GCEP requests involving air permit applications and waste disposal considerations.

#### Opacity Monitoring

Although continued efforts need to be carried out to improve the performance of the U. S. EPA-required opacity monitoring system at the Steam Plant, noteworthy improvements in the preparation of monitoring reports and maintenance of the monitors have been accomplished. Environmental Control has expended considerable effort in identifying the problems and coordinating maintenance and operational remedial actions. While EPA continues to be concerned with the recurring monitoring problems that have been experienced, they have been impressed with the strong commitment that GAT has demonstrated in their corrective actions.

*EPA pleased we are concerned - Region 5 Chicago is toughest -*

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RCRA

*Ohio EPA has not looked at -*

*In good shape -*

GAT has made substantial progress in implementing a hazardous waste management program and it appears that the program, with few exceptions, fulfills the RCRA regulatory requirements of both U. S. EPA and Ohio EPA. The formal training program recently developed, once fully implemented, should fulfill the RCRA training requirements. An improvement project has been proposed to achieve regulatory compliance for the X-752 Hazardous Waste Storage Facility. The proposed improvements should meet the RCRA storage requirements and in addition be compatible with health, safety, and fire protection concerns. Although we support the project as proposed, it is recommended that a permanent dike be installed as soon as possible. The dike should have priority over the other improvements in the project and if necessary needs to be independent of the rest of the project in order to achieve its installation sooner. In general, the GAT RCRA program has been well planned and implemented.

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